

EXHIBIT 1

Memorandum of Activity

Case Number: I16A0120900	Office: Region 5 - Western (San Francisco)	Type of Activity: Interview
Date of Activity: 04/29/2024	Date Report Drafted: 05/03/2024	Location of Activity: MS Teams
Subject of Activity: CROUCH, JIM	Activity Conducted By (Name(s)): Richard Ficarelli	Signature: R F

On April 29, 2024, Special Agent (SA) Reggie Lee and SA Richard Ficarelli, U.S. Department of Transportation, Office of Inspector General (DOT-OIG), Oakland, CA, interviewed Jim Crouch (Crouch), former Director of Safety and Training, United States Parachute Association (USPA), via Microsoft Teams. Also present were Assistant U.S. Attorneys Kate Lydon and Dhruv Sharma, U.S. Attorney's Office, Eastern District of California. After being advised of the identity of the agents and the nature of the inquiry, Crouch essentially provided the following information in addition to his previous statements:

USPA is recognized by the Federal Aviation Administration (FAA) as the only skydiving association for the sport. USPA develops rules and recommendations for safe skydiving and member benefits. There are four different types of USPA licenses: A-license, B-license, C-license, and D-license. A-license holders must complete 25 jumps; B-license is 50 jumps; C-license is 100 jumps; and D-license is 200 jumps. Each license represents the proficiency of the skydiver and the number of jumps completed, which allows them to attend different competitions and jump from different drop zones.

Crouch described tandem jumps as the first jump method where someone without experience can skydive using equipment for two people. The student wears a harness without a parachute and is attached to a Tandem Instructor (TI). Both the student and the TI exit the aircraft together as a pair. During freefall, the drogue parachute is released to decelerate the freefall from 165 mph to 110-120 mph. This allows the main parachute to open softer for the tandem pair at 5,000 feet.

In the early 2000s, the former Director of Safety and Training left USPA. During this period, Crouch had seven years of jumping experience and had just purchased a skydiving school in West Point, VA. A friend at USPA encouraged Crouch to apply for the vacant position. At the time, Chris Needels was the USPA Executive Director. Crouch previously held a USPA Instructional rating and served as an Examiner for Coach, TI, and Safety & Training Advisor (STA). Crouch served as the Director of Safety and Training from July 2000 to October 2018. USPA headquarters was originally based in Alexandria, VA, then moved to Fredericksburg, VA, in 2016.

Crouch's responsibilities included licensing, ratings, working with the Board of Directors, the development of rules and recommendations for Instructional Rating Manual, tracking skydiving accidents, capturing industry trends, and the recommendation of reverse trends. Crouch also interacted with skydivers. Crouch hosted rating renewal seminars, Examiner refresher seminars, and assisted with administrative issues concerning training and students. Crouch assisted with Examiner courses and wrote a majority of the course. Crouch held an IE and taught TI courses for 1-2 years during his 18-year career with USPA. Crouch was less involved with the courses but did enough to remain current on the training material. Crouch also employed other IEs at his skydiving school.

Crouch mostly trained people who were weekend or holiday skydivers, or those who wanted to learn the best methods and practices for tandem skydiving. Crouch also interacted with TI candidates who were looking for courses or training materials. Crouch stated it was widely known that the TI course had to be taught by a TI Examiner certified by the USPA. TI candidates wanted to have their proficiency cards completed to earn a USPA

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TI rating, so they could conduct tandem jumps. Industry wide, TI Examiners have a wealth of knowledge and experience dealing with real world tandem skydives and scenarios. Crouch explained that tandem skydiving is very different than solo jumps, as you must manage yourself and the student. TI must ensure their students are trained in how to help the TI in the airplane, exiting the airplane, and proper body positioning. Students, in front, do not need to complete emergency procedures.

Tandem skydiving is physically demanding, as the additional weight can be difficult to deal with. Tandem skydiving has different emergency protocols than solo skydiving. Tandem equipment has five different handles and must be activated in the correct order. Crouch explained the order can change depending on if it is a routine skydive versus an emergency. Moreover, if an incorrect handle is activated out of order, it can be fatal. Crouch stated that critical equipment is understood very well, and that he engrained this aspect of training in his students in every course he ran.

TI Examiners are expected to ensure all course paperwork and tests are administered at the course. The TI candidates' completed proficiency card and FAA medical certificate is then sent to USPA to process their rating. Crouch indicated that occasionally United Parachute Technologies (UPT) paperwork is sent to USPA as a packet but not always. Crouch explained it has been an ongoing challenge making sure UPT received their paperwork. There are five other tandem manufacturers, and each have their own set of requirements.

Parachute operations are regulated by Part 105 of the Code of Federal Regulations (CFR), which contains specific language requiring a USPA master parachute license. The "master parachute" designation was the old title for a D-license in the early 2000s but has since been removed. The USPA is the only licensing association recognized by the FAA. Crouch opined that the name of the association was left this way in case there were other associations formed in the U.S. The USPA does not recognize foreign licenses. Crouch stated the USPA tried to recognize foreign licenses in the past; however, it became challenging trying to figure out the USPA requirements. In approximately 2010-2012, Crouch suggested that the Board of Directors require foreign candidates attain a USPA D-license to show that they had the necessary experience. A USPA D-license is required for tandem jumps.

Crouch stated that several foreign candidates completed their license application, Coach and Tandem courses concurrently while in the U.S. At the end of training, the Examiner would send all the candidates' paperwork in one batch. Successful completion of the certification course included a minimum of 10 tandem jumps: five initial jumps, then the remaining five jumps were required before jumping with a student. Training courses are only administered by USPA or UPT members. USPA is the only other recognized course provider. Originally, the manufacturer was the only course developer, then over the years, USPA became increasingly involved in tandem ratings.

The TI rating is the most recognized rating around the globe, which is why several foreign candidates travel from Europe and Asia to the U.S. to attain this rating. Some foreign drop zones require USPA ratings. Crouch saw foreign drop zones looking for USPA rated instructors. Drop zones in Australia, New Zealand, and some in Europe had their own tandem programs. Most countries have a way to convert a USPA tandem rating. USPA previously had a conversion process, but it was too difficult to track. The process was outlined in the USPA manual as requirements for foreign skydivers.

Crouch interacted with TI Examiners daily by phone and emails. Crouch answered administrative related questions, including how to handle candidate problems, training, and behavioral issues. Every two years, Crouch hosted Examiner seminars around the country. Examiners were required to attend the seminars in person. It has since changed to virtual meetings. In 2015-2016, there were approximately 200 Examiners.

Crouch released instructions via the USPA Instructional Rating Manual (IRM). Crouch developed most of the instructional material, developed courses, and updated manuals on an annual basis or biannually. In 2001, the

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IRM was first published. At the time, USPA did not have a training program. Crouch's goal was to improve the rating process. Crouch faced many challenges with the Board of Directors, as it took longer than he (Crouch) had hoped to develop the program. Crouch was also responsible for the initial content and updates after Board meetings for the Skydiver Information Manual (SIM).

Crouch never met Rob Pooley (Pooley) personally. Crouch knew of Pooley based on Crouch's interaction with other skydivers. Crouch knew Pooley was a full-time employee at the Parachute Center in Lodi, CA. In 2013, Crouch first interacted with Pooley when Pooley became a Coach Examiner. Crouch found 12-14 disciplinary notes related to Pooley from 2013 to the time of the accident in 2016. Crouch stated the notes were maintained in an excel spreadsheet and other forms, and that he was willing to share them with DOT-OIG. Continuing in 2013, a Compliance Group was developed within USPA. Crouch pushed hard with the Board for this group. Prior to development of this group, if someone violated USPA rules, Crouch would receive the complaint, then forward it to the Regional Directors for action. Crouch stated it bothered him that he never heard back from the Regional Directors. The Compliance Group included five different members of the Board and Crouch.

Crouch reviewed an email dated August 10, 2015. Crouch explained the email discussed course fee changes.

Crouch reviewed an email dated August 28, 2015. Crouch stated he wanted to make it clear to Pooley that he could not conduct the courses. The Board had issue with how Pooley was running his courses, not as a TI. Crouch explained that the Board's general viewpoint was to allow Pooley to continue jumping and make a living with TI candidates, not run courses. Moreover, Crouch believed that Pooley understood the Board's decision. Pooley never indicated that he did not understand this decision.

Crouch reviewed an email dated September 1, 2016. Crouch included Yuri Garmashov (Garmashov) on the email because at the time it was difficult to determine his level of involvement. Crouch stated he reviewed several records to identify TI candidates who had received training from Pooley and Garmashov, particularly those who received may have received instruction on emergency procedures. Ultimately, Crouch identified 140 TI candidates. Crouch explained that he received mixed feedback from the affected TI candidates, some positive, but mostly negative reactions. Crouch understood how much of an inconvenience it was to have to re-accomplish training with an Examiner. Crouch stated it was a difficult process managing the training recall, as the candidates were spread out worldwide. Crouch occasionally heard from multiple TI candidates that they did not receive emergency procedure training, they jumped on the first day of training, and were told to read books ahead of time.

Following the fatalities at the Parachute Center in August 2016, Crouch had a few interactions with Pooley. Crouch assisted the Compliance Group with revoking Pooley's USPA membership and ratings. Garmashov and Bill Dause (Dause)'s USPA memberships were also revoked. Crouch stated this was the only action USPA could take against Pooley, Garmashov, and Dause. Crouch explained that parachutist must have a current USPA member to have a valid license. Crouch heard from various individuals that Pooley, Garmashov, and Dause, were still performing tandem jumps. Crouch clarified that he did not vote on the group's decision; however, he arranged conference calls and kept notes on all the proceedings. Jason Putnam (Putnam), Regional Director, Pacific Region, USPA, was the main person tasked with collecting the facts surrounding the incident, then it was turned over to Joshua Hall (Hall), Regional Director, Western Region, USPA.

Crouch emailed the following documents:

- Pooley Notes spreadsheet
- Crouch Resume

Reviewed By (Initials): C L Date: 05/07/2024

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DG Discussion / DG Disciplinary Action

12/9/2013 Notified Jason that HQ has had to reject many ratings because Rob Pooley is holding courses at Lodi but he has not paid the fee to allow him to hold courses for a year.

1/10/2014 Jason stated he had spoken to Pooley and Pooley should be getting the required paperwork and fees to USPA in order to hold courses for a year.

1/17/2014 Received Pooley's course fee paperwork at HQ. It was decided by RD, HQ and Pooley on 1/21 that he just pay the fee and not be added as a GM.

1/31/2014

2/4/2014 Jason emailed DG with a request for meeting about Rob Pooley and his lack of handling certification courses correctly, not sending in rating cards and holding a course without a rating.

2/7/2014 Received letter from Jay Stokes stating he retrained Rob on tandem course procedures and recommended he be reinstated as an examiner.

2/24/2014 Jason Gordon notified Pooley that his examiner ratings were reinstated following a 10 day suspension and retraining by Jay Stokes as sufficient action for his conduct.

4/3/2015 Allegations of abuse of prescription pain meds in an email with many photos of different pain medication bottles.

4/8/2015 DG discussed allegations and decided that it warranted looking into due to alleged drug use and holding an FAA medical as a violation.

4/17/2015 Jason Gordon spoke to Pooley about the drug use. Pooley had his AME provide a letter stating that Pooley was no longer using prescribed medications. The DG decided to wait for the 1-6 procedure.

6/10/2015 Jason will notify Rob with 1-6 notice and he will have a chance to respond via the 1-6 procedure.

6/21/2015 Rob emailed Jason and DG with explanations for the lack of a rating for Thomas Whittenburg.

6/23/2015 Jason emailed Rob with proposed date of July 8 for conference call with DG

7/8/2015 IDG call with Rob Pooley and Whittenburg. DG decided that their story and timeline was inaccurate and seemed to be largely a made up account of what happened.

7/14/2015 IDG call. After reviewing documents and verifying what UPT had received, decided to send Executive Committee a recommendation of a 1 year suspension of examiner ratings.